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May 6, 2020

VIA ECF

SECOND REQUEST FOR ADJOURNMENT AND EXTENSION OF TIME
Conference of May 14, 2020 at 10:30 am

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Eduardo v. 1st Class Staffing, et al
Case No. 20-CV-1557 (LGS)
Our File No. 01593.01465

Dear Judge Schofield:

We are the attorneys for the defendants 1st Class Staffing in the above-referenced action. We are seeking:

1. a one month adjournment of the initial pretrial conference scheduled for May 14, 2020 at 10:30 am, as set forth in your April 8, 2020 Order (ECF No. 6);
2. An equivalent adjustment of the due date for the joint proposed Civil Case Management Plan and Scheduling Order until 5 days before the adjourned conference date.
3. Defendants 1st Class Staffing and Lorenzo Foods are seeking a 30 day extension of time to answer or file a letter motion seeking a pre-trial conference.¹

This is the second request for an adjournment. The parties have made progress in settlement discussions and have a good faith belief that if this request is granted, a settlement can be reached, obviating the need for a conference.

Counsel for all parties have consented to the requests herein.

¹ Defendant Alex L/N/U, an employee of Defendant 1st Class Staffing only, has not yet been served, but Plaintiff continues to make best efforts to locate him. Counsel for 1st Class Staffing does not represent him. Counsel for Lorenzo Food does not represent that individual and denies he was their employee.



Thank you for your courtesy in this matter.

Respectfully submitted,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP

Steven L. Young

cc: All counsel (VIA ECF)

Application GRANTED in part and DENIED in part.

The initial conference set for May 14, 2020, at 10:30 A.M. is adjourned to June 4, 2020, at 10:30 A.M.
Pre-conference materials are due on May 28, 2020.

The time for Defendants 1st Class Staffing and Lorenzo Foods to answer or otherwise respond is adjourned to June 15, 2020. Plaintiff shall file evidence of service to Lorenzo Foods on the docket by May 28, 2020.

May 7, 2020
New York, New York

A handwritten signature in black ink, appearing to read 'Lorna G. Schofield', written over a horizontal line.

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE